

**UNITED STATES DISTRICT COURT
THE SOUTHERN DISTRICT OF NEW YORK**

JFP TOURING, LLC)
)
) Plaintiff,)
) **NOTICE OF MOTION TO ADMIT**
) **JOHN W. FROST, II PRO HAC VICE**
 vs.)
)
) POLK THEATRE, INC.,)
)
) Defendant.)
)
)
)
)
)
)

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Charles R.A. Morse, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Applicant's Name: John W. Frost, II
Firm Name: Frost Tamayo Sessums & Aranda, P.A.
Address: 395 South Central Avenue
City/State/Zip: Bartow, FL 33830
Phone Number: (863) 533-0314
Fax Number: (863) 533-8985
Email: jfrost1985@aol.com

FILED
U.S. DISTRICT COURT
2007 AUG -7 PM 2:41
S.D. N.Y.

John W. Frost, II is a member in good standing of the bar of the State of Florida. There are no pending disciplinary proceedings against Mr. Frost in any State or Federal Court.

Dated: August 7, 2007
New York, New York

Respectfully submitted



Charles R.A. Morse (CM-6658)
JONES DAY
222 East 41st Street
New York, NY 10017-6702
Telephone: (212) 326-3939
Facsimile: (212) 755-7306
Email: cramorse@jonesday.com

**UNITED STATES DISTRICT COURT
THE SOUTHERN DISTRICT OF NEW YORK**

JFP TOURING, LLC)	Case No. 07-cv-03341 (CM) (RLE)
)	
Plaintiff,)	AFFIDAVIT OF CHARLES R.A.
)	MORSE IN SUPPORT OF MOTION
vs.)	TO ADMIT JOHN W. FROST, II PRO
)	HAC VICE
POLK THEATRE, INC.,)	
)	
Defendant.)	
)	
)	
)	
)	

State of New York)
) ss:
County of New York)

Charles R.A. Morse, being duly sworn, hereby deposes and says as follows:

1. I am a partner with Jones Day. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit John W. Frost, II as counsel pro hac vice to represent Defendant in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on August 19, 1998. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known John W. Frost, II since June 2005.

4. Mr. Frost is a shareholder with Frost Tamayo Sessums & Aranda, P.A. in Bartow, Florida.

5. A Certificate of Good Standing issued to Mr. Frost by the Florida Bar is attached hereto as Exhibit A.

6. I have found Mr. Frost to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.


7. Accordingly, I am pleased to move the admission of John W. Frost, II, pro hac vice.

8. I respectfully submit a proposed order granting the admission of John W. Frost, II, pro hac vice, which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that the motion to admit John W. Frost, II, pro hac vice, to represent Defendants in the above-captioned matter, be granted.

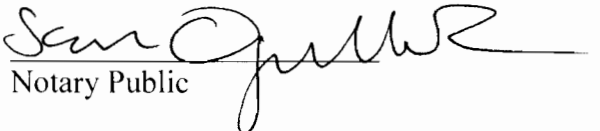
Dated: August 7, 2007
New York, New York

Respectfully submitted



Charles R.A. Morse (CM-6658)

Sworn to before me this 7 th
day of August, 2007



Notary Public

My Commission Expires 7/31/10

SEVAN OGULLUK
NOTARY PUBLIC, State of New York
No. 02068045589
Qualified in Nassau County
Commission Expires July 31, 2010

EXHIBIT A



The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600
WWW.FLORIDABAR.ORG

State of Florida)

County of Leon)

In Re: 114877

John Wesley Frost, II
Frost Tamayo Sessums & Aranda, P.A.
P.O. Box 2188
Bartow, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on June 20, 1969.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 2nd day of August, 2007.

Willie Mae Shepherd
Supervisor, Membership Records
The Florida Bar

WMS/smrz2/R10

EXHIBIT B

**UNITED STATES DISTRICT COURT
THE SOUTHERN DISTRICT OF NEW YORK**

JFP TOURING, LLC)	Case No. 07-cv-03341 (CM) (RLE)
)	
Plaintiff,)	ORDER TO ADMIT JOHN W. FROST,
)	II PRO HAC VICE
vs.)	
)	
POLK THEATRE, INC.,)	
)	
Defendant.)	
)	
)	
)	
)	

Upon the motion of Charles R.A. Morse, sponsor attorney, and his affidavit in support,

IT IS HEREBY ORDERED:

Applicant's Name:	John W. Frost, II
Firm Name:	Frost Tamayo Sessums & Aranda, P.A.
Address:	395 South Central Avenue
City/State/Zip:	Bartow, FL 33830
Phone Number:	(863) 533-0314
Fax Number:	(863) 533-8985
Email:	jfrost1985@aol.com

is admitted to practice pro hac vice as counsel for Defendants in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: _____, 2007

United States District Judge

CERTIFICATE OF SERVICE

The foregoing documents were served on the following counsel of record on August 7, 2007 via U.S. Mail:

Leslie Ben-Zvi, Esq.
1790 Broadway, 10th Floor
New York, NY 10019
Telephone: (212)
Facsimile: (212)

A handwritten signature in cursive script, appearing to read "Chas Morse", is written above a horizontal line.

Charles R.A. Morse